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**UNITED STATES DISTRICT COURT  
 EASTERN DISTRICT OF CALIFORNIA**

J.M., an individual,	)	Case No. 2:22-cv-00672-KJM-JDP
	)	
Plaintiff,	)	JUDGE KIMBERLY J. MUELLER
	)	
v.	)	<b>JOINT STIPULATION TO CONTINUE PRE-</b>
	)	<b>TRIAL DEADLINES</b>
CHOICE HOTELS INTERNATIONAL, INC., et	)	
al.,	)	
	)	
Defendants.	)	

WHEREAS Plaintiff J.M. ("Plaintiff") initiated this case against Defendants Choice Hotels International Inc. ("Choice") and Red Roof Inns, Inc. ("RRI Inc.," and collectively with Plaintiff, the "Parties") on April 15, 2022 (Dkt. No. 1);

WHEREAS Plaintiff filed a First Amended Complaint (“FAC”) on June 10, 2022 (Dkt. No. 10);  
WHEREAS this Court issued a scheduling order on October 7, 2022 setting pretrial deadlines in this case (Dkt. No. 36);

WHEREAS Plaintiff filed a Second Amended Complaint (“SAC”) on December 1, 2022 (Dkt. No. 52);

WHEREAS Choice was dismissed from this case on February 28, 2023 (Dkt. No. 66);

WHEREAS RRI Inc. filed a motion to dismiss on December 15, 2022 (Dkt. No. 53) and received an order on that motion on May 15, 2023 (Dkt. No. 70);

WHEREAS new counsel for RRI Inc. was substituted into this case on May 18, 2023 (Dkt. Nos. 71-73);

WHEREAS RRI Inc. filed its Answer to Plaintiff’s SAC on May 26, 2023 (Dkt. No. 74);

WHEREAS the Parties met and conferred on June 21, 2023 to discuss the forthcoming scheduling conference on July 13, 2023 and joint statement thereto, along with the status of the protective order and ESI protocol in this case;

WHEREAS the Parties met and conferred and filed a stipulation requesting an approximately nine (9) month continuance of pretrial deadlines on June 30, 2023 (Dkt. No. 76);

WHEREAS this stipulation was the first time the Parties made a request for an extension of the scheduling order;

WHEREAS, on July 7, 2023, the Court denied that request, noting that the “Parties present no reason supporting their request for a continuance of pretrial deadlines of over six months” (Dkt. No. 80);

WHEREAS the Parties further met and conferred on July 13, after receiving the Court’s guidance, and agreed that a six (6) month continuance of the deadlines may be sufficient at this time;

WHEREAS the Parties believe good cause exists to continue the existing pretrial deadlines by six (6) months because (1) the Parties are still in the process of meeting and conferring regarding a protective order and ESI protocol; (2) with the new association of counsel, these negotiations have started somewhat anew; and (3) with no protective order or ESI protocol yet in place, the Parties therefore still need to engage in discovery;

WHEREAS this stipulation is not made for any improper purpose and will not prejudice any party;

**STIPULATION**

NOW, THEREFORE, Plaintiff J.M. and Defendant Red Roof Inns, Inc. stipulate and request the Court continue the presently set pretrial dates as follows:

EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Fact Discovery Cutoff	July 7, 2023	January 3, 2024
Expert Disclosures	August 11, 2023	February 7, 2024
Disclosure of Rebuttal Reports	September 15, 2023	March 13, 2024
Expert Discovery Cutoff	October 15, 2023	April 12, 2024
Last Day to Hear Dispositive Motions	November 15, 2023	May 13, 2024

Respectfully submitted,

/s/ Jennifer J. El-Kadi (authorized on 7/13/23)

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*Attorneys for Defendant Red Roof Inns, Inc.*

**ORDER****PURSUANT TO STIPULATION, IT IS SO ORDERED.**

The pretrial deadlines in the above-captioned matter are continued as follows:

EVENT	CURRENT DEADLINE	DEADLINE
Fact Discovery Cutoff	July 7, 2023	January 3, 2024
Expert Disclosures	August 11, 2023	February 7, 2024
Disclosure of Rebuttal Reports	September 15, 2023	March 13, 2024
Expert Discovery Cutoff	October 15, 2023	April 12, 2024
Last Day to Hear Dispositive Motions	November 15, 2023	May 13, 2024

The court does not anticipate granting further continuances absent a showing of extraordinary cause.

DATED: July 18, 2023.

  
CHIEF UNITED STATES DISTRICT JUDGE